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San Francisco

UNITED STATES BANKRUPTCY COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

In re
The Roman Catholic Archbishop of San
Francisco,

Debtor and
Debtor in Possession.

The Roman Catholic Archbishop of San
Francisco,

Plaintiff,

v.

John DB Roe SF, John Doe H.M., C.M.,
John Doe SF 1218, Jane Doe SF 2017, John
Roe 521, John Roe 663, John Doe 664, LL
John Doe WC, John Doe SF 2028, John
Doe SF 1510, John Doe, John Roe 644,
Jane Roe, G.J., M.R.H., John Doe SF 1426,
John Doe L.M., John Roe 457, John Doe

Case No. 23-30564

Chapter 11

Adv No. 25-03019

**NOTICE OF HEARING ON MOTION FOR
ORDER EXTENDING STAY TO ALL
STATE COURT CASES IN WHICH
DEBTOR AND/OR NON-DEBTOR
AFFILIATES ARE NAMED AS
DEFENDANTS UNDER BANKRUPTCY
CODE SECTIONS 105(a) AND 362**

Judge: Hon. Dennis Montali
Date: June 26, 2025
Time: 1:30 p.m.
Place: Zoom.Gov

1 A.D.R., John Doe A.L.R., John Roe 417,
2 John Roe 499, G.W., Joseph Doe OAK 475,
3 John Doe MR 1236, Jane Doe 7, John PV
4 Roe 554, John Doe F.O., John Doe
5 CLG03522, John Doe SF 1913, Jane Doe
6 SF 1260, John Doe SF 1026, John Doe SF
7 1196, Jane Doe SF 1200, John Doe SF
8 1201, Jane Doe SF 1233, Joseph Doe SF
9 601, and Jane Doe 116,
10 Defendants,

11
12
13 **TO THE HONORABLE DENNIS MONTALI, UNITED STATES BANKRUPTCY**
14 **JUDGE, THE UNITED STATES TRUSTEE, AND ALL DEFENDANTS:**

15 **PLEASE TAKE NOTICE** that on May 29, 2025, The Roman Catholic Archbishop of San
16 Francisco, the debtor and debtor in possession in the above-captioned chapter 11 case and plaintiff
17 in the above-captioned adversary proceeding (the “Debtor”), filed its *Motion for Order Extending*
18 *Stay to All State Court Cases in Which Debtor and Non-Debtor Affiliates Are Named as*
19 *Defendants Under Bankruptcy Code Sections 105(a) and 362* (the “Motion”), *Memorandum of*
20 *Points and Authorities in Support of Motion for Order Extending Stay to All State Court Cases in*
21 *Which Debtor and/or Non-Debtor Affiliates Are Named as Defendants Under Bankruptcy Code*
22 *Sections 105(a) and 362* (the “Memorandum of Points and Authorities”),¹ and supporting
23 declarations of Paul E. Gaspari (the “Gaspari Declaration”) and Barron L. Weinstein (the
24 “Weinstein Declaration”).

25 **PLEASE TAKE FURTHER NOTICE** that a hearing to consider the Motion (the
26 “Hearing”) will be conducted via videoconference has been scheduled for **June 26, 2025, at 1:30**
27 **p.m.** before the Honorable Dennis Montali, United States Bankruptcy Judge.

28 **PLEASE TAKE FURTHER NOTICE** that by the Motion, the Debtor seeks entry of one
or more orders for declaratory and injunctive relief as follows:

¹ Capitalized terms not otherwise defined in this notice shall have the same meanings ascribed to them in the Motion and Memorandum of Points and Authorities.

1 1. A declaration that the automatic stay under Bankruptcy Code Section 362(a)²
2 applies to all State Court Actions in which the Debtor is named as a co-defendant along with Non-
3 Debtor Affiliates;

4 2. A declaration that the automatic stay under Section 362(a) applies to all State Court
5 Actions in which Non-Debtor Affiliates are named as defendants because such actions would
6 implicate property of the estate;

7 3. A declaration that any acts to continue prosecution, discovery, or trial preparation
8 in these State Court Actions violate the automatic stay and are void;

9 4. A declaration that the automatic stay extends to any future State Court Actions that
10 plaintiffs may seek to actively litigate against the Debtor and/or Non-Debtor Affiliates during the
11 pendency of this Case; and

12 5. In addition, and in the alternative, an injunction pursuant to Bankruptcy Code
13 Section 105(a) barring the prosecution of each of the State Court Actions which names any of the
14 Non-Debtor Affiliates as a defendant and the Debtor as a co-defendant during the pendency of this
15 Case, or until further order of this Court.

16 **PLEASE TAKE FURTHER NOTICE** that the Motion is based on the Memorandum of
17 Points and Authorities, the previously filed Declaration of Joseph J. Passarello in Support of
18 Chapter 11 Petition and First Day Motions (the “Passarello Decl.”) [ECF No. 14], the previously
19 filed Declaration of Paul E. Gaspari in Support of Chapter 11 Petition and First Day Motions
20 [ECF No. 15], the concurrently filed Gaspari and Weinstein Declarations, the supporting exhibits
21 for each, all pleadings, papers, and records on file with the Court, and such other evidence, both
22 oral and documentary, as may be presented to the Court at or before the time of the Hearing.

23 **NOTICE IS FURTHER GIVEN** that the Hearing will be conducted only via Zoom. The
24 court’s website offers information explaining how to arrange an appearance at a video hearing. If
25 you have questions about how to participate in a video hearing, you may contact the court by
26 calling 888-821-7606 or by using the Live Chat feature on the court’s website. The Bankruptcy

27 _____
28 ² All section references in this notice are to title 11 of the United States Code (the “Bankruptcy Code”).

1 Court's website provides information regarding how to arrange an appearance at a video or
2 telephonic hearing. If you have questions about how to participate in a video or telephonic
3 hearing, you may contact the court by calling 888-821-7606 or by using the Live Chat feature on
4 the Bankruptcy Court's website. The link to the judge's electronic calendar is:
5 <https://www.canb.uscourts.gov/judge/montali/calendar>.

6 **NOTICE IS FURTHER GIVEN** that on or before **June 12, 2025**, any opposition or
7 response to the Motion must be in writing, filed with the Bankruptcy Court, and served on the
8 counsel for the Debtor and its bankruptcy counsel as listed on the upper left-hand corner of the
9 first page of this notice, and any other party that has requested notice in the above-captioned
10 adversary proceeding. Failure to timely file opposition and appear at the Hearing may constitute a
11 waiver of your objections. Your rights may be affected. You should read these papers carefully
12 and discuss them with your attorney, if you have one in this Bankruptcy Case. If you do not have
13 an attorney, you may wish to consult one.

14
15 Dated: May 29, 2025

FELDERSTEIN FITZGERALD WILLOUGHBY
PASCUZZI & RIOS LLP

17 By

/s/ Paul J. Pascuzzi

PAUL J. PASCUZZI
JASON E. RIOS
THOMAS R. PHINNEY

Attorneys for The Roman Catholic Archbishop of
San Francisco

21 Dated: May 29, 2025

22 SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

25 By

/s/ Ori Katz

ORI KATZ
AMANDA L. COTTRELL

Attorneys for The Roman Catholic Archbishop of San
Francisco